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Before the  
Federal Communications Commission  
Washington, D.C. 20584

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In the Matter of

1998 Biennial Regulatory Review --  
Amendment of Part 97 of the Commission's  
Amateur Service Rules.

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WT Docket No. 98-143

### COMMENTS ON PROPOSED RULEMAKING

Date: 11 September 1998

Comments of: Beverly A. Carlson

#### I. INTRODUCTION

1. I am an Extra class Amateur operator. I was first licensed in 1972. I am a Volunteer Examiner and a member of the American Radio Relay League (ARRL). I have earned a BME (Bachelor of Music Education) and a ME (Master of Education). I have twelve (12) years experience as a classroom teacher.

#### II. EXECUTIVE SUMMARY

2. In these comments, I propose the following changes to, or comments on, WT Docket No. 98-143.

- Do not lower telegraphy testing speed requirements (5, 13 and 20 words per minute).
- Keep the Novice bands as CW only and increase power allowed to 1500 watts PEP.
- Require one minute of solid perfect copy to pass a CW examination.
- Eliminate published question pools.
- Establish FCC review of Amateur question pools to eliminate foolish questions.
- Do not accept ARRL as the leading representative for US Amateurs in this matter.
- I have no objection about eliminating the Novice class license.

File of Comments

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- I have no objection about Advanced class VE's giving up to General Class examinations.
- FCC must fix the medical waiver for telegraphy as it is being badly abused.
- A way to improve the effectiveness of the FCC Amateur Auxiliary.

## **A. TELEGRAPHY EXAMINATION REQUIREMENTS**

3. A trained pool of Morse code (CW) operators is a valuable national resource. CW can communicate in emergency situations when no other form of communications will work. That is why the Army Special Forces (Green Berets) train and use CW operationally. As some other agencies eliminate CW, the Amateur CW operators become even more critically needed for communications emergencies.

4. CW speeds of thirteen (13) words per minute (WPM) are necessary as this is the average conversational speed used by CW operators. Twenty (20) WPM is appropriate for the Extra class license which is only exclusively granted small segments of HF spectrum. Operators who are not willing to exert the effort and time to attain twenty (20) WPM are not being denied much frequency spectrum. They are mainly denied short call signs. The Central Intelligence and National Security Agencies still recruit CW operators capable of twenty (20) WPM or higher, and would not like to see this standard lowered.

5. The only negative impact of eliminating the Novice class license I find is the lack of an opportunity for new Amateur Radio operators to begin using Morse code at a slow speed on the air as they strive to increase their speed. I would recommend either including five (5) words per minute (WPM) in the Technician requirements or leaving the Technician Plus license as is and possibly renaming it Intermediate class with the same requirements. It is advantageous for Amateur operators to not only be able to copy Morse Code but they should be comfortable using it on the air. This isn't likely to happen without "on the air" experience.

6. The pressure to reduce Amateur Radio standards is coming from equipment retailers who believe more ham licenses mean more Japanese radios will be sold. Please do not lower the standards for Amateur radio licenses by lowering CW code speed standards. Remember the mess you created with the Citizen's band – unusable frequency spectrum, foul language, illegal equipment, etc. This was all due to low licensing standards! The more effort required to attain a license, the more respect given to the rules and regulations for that license. There are many who will dispute this opinion but you only have to look at all the low income public housing the United States Government has provided to mostly welfare recipients. The residents immediately began to destroy these beautiful buildings to the point they had to be demolished after only a few years of occupancy because they had not worked hard to earn the right to live there. This phenomenon has begun slightly in Amateur Radio because of the ability to memorize questions and answers with no real

understanding of the theory. We have to protect what we have left and increase the standards if possible.

7. The code examination requirement should consist of one minute of perfect copy out of five minutes of text. No ten (10) question examination, and especially no multiple choice examinations (25% chance of guessing correctly) which currently exists. No dots and dashes should be allowed in the code copy. That is not copying by ear.

8. The argument that CW should be eliminated as an Amateur license requirement because it is not used by commercial or government communicators is very flawed. As I have already mentioned the US Government (CIA, NSA and Special Forces) still need CW operators and still use CW. Foreign governments and shipping still send distress signals in CW even though the US has foolishly abandoned CW in it's shipping industry and Coast Guard. US Amateurs should be able to help an international station calling for help in Morse code.

9. Remember that while Amateur radio is a Service, it is manned by hobbyists who enjoy using CW. The elimination of commercial and military sail boats did not kill sailing as a hobby or eliminate the requirement for licensing of sail boats or masters of sailing vessels carrying passengers!

## **B. THE ARRL**

10. The ARRL appears to now represent the commercial interests who advertise in its' magazine more than its' membership, which overwhelmingly wants the CW standards left alone. You should note that only about 1/4 of the Amateurs in America are ARRL members. The letter you received from the ARRL on this issue certainly does not represent even the 1/4 who are members. The ARRL officers are not elected by the membership but are appointed by the board of directors (6 of 15 of whom voted against the letter). 63% of ARRL members and 54% of non members have voted to leave the international CW requirement as is. The ARRL says its' recent survey shows 41% of its' members want the 20 WPM code speed requirement reduced. They failed to say that 71% expressing this desire hold general or advanced class licenses and aspire to an easier upgrade to extra class. 59% of Extra class licensees supported the 20 WPM requirement. The bottom line is that a survey can be designed to give any desired result!

## **C. AMATEUR RADIO WRITTEN EXAMINATIONS**

11. The current Amateur written examinations only require the ability to memorize and retain the question pool just long enough to past the written test while requiring no real understanding of the technical knowledge and some of these questions are absolutely foolish.

12. The FCC should establish a review procedure over these question pools. Question pools should not be published. Only subject areas and sample questions to encourage study and real understanding of the principles involved.

13. Having separate examinations for element 2 and 3A is no burden to the Volunteer Examiners. It really doesn't matter to VE's how many written tests a candidate may take. That only amounts to a little more time. I have always scheduled a whole morning or whole afternoon for a test session that I have participated in since we never know how many candidates will appear for testing or how long each candidate will spend taking each test.

#### **D. ELIMINATION OF NOVICE AND TECHNICIAN PLUS**

14. I have no objection to the elimination of the Novice class license as long as you don't lower the standard for General class CW or written examinations. (see paragraph 5)

#### **E. MORE AUTHORITY FOR ADVANCED CLASS VEs**

15. I have no objection to advanced class VEs being allowed to administer examinations up to and including general class. VEs who received credit for CW by a doctor's certification must not be allowed to administer the code tests which they have never passed. They could play an incorrect code tape and never realize their mistake.

#### **F. FRAUD IN DOCTOR CERTIFICATIONS FOR CODE**

16. FCC must stop fraud in doctor's certification code candidates by eliminating the doctor's certificate. 8% of CW is credited this way. As an experienced educator with an advanced degree, I can think of only one disability that would prevent anyone from being able to learn Morse Code and pass a test up to 20 words per minute (WPM). That disability is an extremely low intelligence quotient (IQ). Any one with an intelligence quotient so low that it prevents the ability to pass a Morse Code test could not possibly understand the theory requirement of any of the Amateur class licenses. For any other disability, I can think of no reason VEs can't accommodate candidates in some way while still protecting the integrity of the test.

17. The unelected president of ARRL, Rod Stafford, in traveling about the USA attending "Hamfests", told an audience in Alamogordo, New Mexico that the ARRL had to write their letter to the FCC because FCC "staffers" wanted to eliminate all code except five (5) WPM. They (the FCC staffers) believe this is a fix to the fraudulent use of medical exemption for code. If this is true, the correct "fix" would be to simply eliminate the medical exemption. "Fixing" the problem by eliminating code above five (5) WPM would be like throwing the baby out with the bath water.

18. When you eliminate the medical waiver, set a time limit of twelve (12) months for all those Amateur Radio operators who upgraded their licenses with a Doctor's certificate to pass that Morse Code requirement legitimately or reduce their license back to their former class.

### **G. DISPOSITION OF NOVICE CW BANDS**

19. The current CW bands are crowded. The ARRL survey indicated that 64% of its' members use CW. At any given moment one can find more activity on CW than SSB on any band except UHF and VHF. Those who claim otherwise are simply wrong. Therefore the novice CW bands should remain exclusively for CW with a power limitation of 1500 watts PEP for all users, including novices.

### **H. BETTER USE OF THE FCC AMATEUR AUXILIARY**

20. Providing Official Observers with an FCC form upon which to notify stations of violations, instead of the ARRL form currently used, would go a long way toward preventing recurrence of violations. An ARRL form is ignored by most violators.

### **III CONCLUSION**

Some of the issues in the possible changes of the Amateur Radio regulations can really be summed up by asking about the purpose. Is the purpose simply to try to help the manufacturers (mostly Japanese) to sell more equipment or are we trying to retain some integrity and high standards for a valuable national resource which is Amateur Radio. We often hear about the "Dumbing of America" that has been allowed to happen in many areas of learning. This is an opportunity for you to set high standards in Amateur Radio for which we can all be proud.



Beverly A. Carlson  
865 Cedardale Drive  
Las Cruces, NM 88005